

ROUTING AND TRANSMITTAL SLIP		ACTION	
1 TO (Name, office symbol or location) <i>Pierce</i>	INITIALS	CIRCULATE	
	DATE	COORDINATION	
2	INITIALS	FILE	
	DATE	INFORMATION	
3 <i>File 816.4</i>	INITIALS	NOTE AND RETURN	
	DATE	PER CON-VERSATION	
4	INITIALS	SEE ME	
	DATE	SIGNATURE	
<b>REMARKS</b>  <i>Bill - for our file - I have carried to me. Jue 4/11/75</i>			
Do NOT use this form as a RECORD of approvals, concurrences, disapprovals, clearances, and similar actions			
FROM (Name, office symbol or location)		DATE	
		PHONE	

Hawaii NPDES Permits

Director, Enforcement Division  
Region IX

Melvin K. Koizumi, Director  
Pacific Islands Contact Office  
1000 Bishop, Suite 601  
Honolulu, Hawaii 96813

Thank you for your memorandum of February 5, 1975, regarding NPDES permits issued by this office to wastewater sources in Hawaii, and list of suggested modifications.

We conclude that no action on the list of suggested modifications is necessary at this time. No review of the permits on a case by case basis has been made, because of the incomplete information in the listing attached to your memo. Further, any request for a permit modification should come directly from the permittee or through the Hawaii Department of Health to the Regional Office, and should contain a complete description of and reason for the change requested. We will modify any permit for which a substantive reason for modification exists.

At the time these permits were issued, we utilized all information available, including that obtained in the course of facility inspections, and provided all concerned with the opportunity to comment or object to permit provisions. Any comments or objections were carefully considered. The permits were either revised accordingly or the commenter notified of our reason for not making the requested revision. The permits were certified by the Hawaii Department of Health. Further, from a cursory review of this list, we have serious doubts as to the need to modify the permits, as suggested.

bc: Tom Kremer

TKremer:C  
Reading File  
3-21/6:29/42  
3-25-75  
055325  
Revised 3-28C  
Cor. 3-31C

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: NPDES Permit Modifications--Hawaii

DATE: February 5, 1975

FROM: Director, Pacific Islands Contact Office

TO: Director, Enforcement Division

Jackie Parnell of the State Department of Health at a meeting held on January 22 and 23, 1975 with the EPA Division Directors and Regional Administrator indicated that about half of the permits issued by EPA prior to the transfer of the NPDES program are presently in need of some modifications; the inference being that EPA had not properly drafted and issued the NPDES permits in the first place. A summary of findings after investigating the matter is included below.

Approximately 63 permits were issued by EPA. Of the 63 permits, 30 are considered to require some modification. Six of the permits contained or are based on what Hawaii considers incorrect information. Fifteen of the permits have undergone changed operating conditions since their issuance and nine permits may require modifications pending further investigation of field conditions. A detailed outline is included in Attachment I.

  
Melvin K. Koizumi

Attachment I

546-8910

ATTACHMENT I

Summary Sheet Of NPDES Permits Issued  
In Hawaii By EPA In 1974

Permits Issued (63)

Permit Modifications (30):

A. Permits Containing Erroneous Information

1. Mahelona Hospital (Permit No. HI0000612)--Timing discrepancy; settleable solids limit effective date does not coincide with final effluent limit effective date.
2. Kauai Electric Co. (Permit No. HI0000353)--Kauai Electric reports their temperature recording mechanism biased so base data for permit in error.
3. Lone Star Industries (Permit No. HI0000558)--Requirement for dredging of riverbed to remove existing deposits may be unreasonable. River is actually dry most of the year. Riverbed contains numerous boulders of large size. The material accumulated in the riverbed is concrete. Other industries in the area have also in the past deposited such concrete which has set in the riverbed. The deposit does not impede river flow during storms.
4. Waialua Sugar (Permit No. HI0000230)--Noncontact cooling water limits are "absolute" numbers. State feels same numbers should be used but they should be "net" rather than "absolute" limits.
5. Kaiser Cement (Permit No. HI0000540)--Parameters for routine monitoring and storm runoff monitoring may be reversed.
6. Kekaha Sugar Company (Permit No. HI0000086)--State Department of Health feels that the effluent limits should be "net" rather than "absolute" limits.

B. Permits on Which Conditions Have Changed Since Issuance:

1. Laupahoehoe (Permit No. HI0000159)
  2. Wainaku (Permit No. HI0000221)
  3. Pepeekeo (Permit No. HI0000191)
  4. Papaikou (Permit No. HI0000248)
  5. Honokaa (Permit No. HI0000256)
- EPA presently carrying out modifications for this group.
6. Standard Oil Refinery (Permit No. HI0000329)--Base data submitted in permit application has changed.

*How many of these - if any - have been modified?*

*Sugar*



Attachment I -- Page 2

7. HC&D (Permit No. HI0000132)--Unable to meet final schedule date and an application for modification has been submitted to EPA.
8. Young Brothers (Permit No. HI0000060)--Attainment date slippage. Request for permit modification made to EPA.
9. Young Brothers (Permit No. HI0000698)--Attainment date slippage. Request for modification made to EPA.
10. Hawaiian Tug and Barge (Permit No. HI0000701)--Attainment date slippage. Request for modification made to EPA.
11. Phillips Petroleum Company (Permit No. HI0000663)--Minor modification requested on monitoring. Phillips wants to eliminate monitoring requirements for parameters reflecting water treatment chemicals which they do not use.
12. Lihue Camp--Kealia (Permit No. HI0000736)--Unable to close camp and cease discharge due to delay in Kauai County approving new houses to be occupied by people presently living in Lihue Camp.
13. Maui Electric (Permit No. HI0000094)--Has requested changes for low-volume waste.
14. Kailua Wastewater Treatment Plant (Permit No. HI0020141)--EPA presently working on permit modifications.
15. Carnation (Permit No. HI0000531)--They have requested revocation of their permit but may be given a no-discharge permit.

C. Permits Likely to be Modified Pending Further Field Investigations:

1. Pioneer Mill Company (Permit No. HI0000078)--Possible tailwater discharges into shore waters.
2. Wailuku Sugar Company (Permit No. HI0000108)--Possible tailwater discharges into shore waters.
3. Maui-Paia Municipal Wastewater Treatment Plant (Permit No. HI0020192)--May be falling behind on its planned construction schedule.
4. Kohala Sugar Company (Permit No. HI0000167)--Factory may be purchased by Davies thus reversing original closure decision.

Attachment I -- Page 3

5. HC&S Sugar Company (Permit No.-None)--Possible tailwater discharge into shore waters.
6. Lihue Plantation Company (Permit No. HI0000124)--Department of Health would like clarification on the monitoring of tailwater. Presently there is a need to monitor under rainy conditions or acts of God. Department of Health may decide that monitoring under these conditions are not necessary.
7. McBryde Sugar Company (Permit No. HI0000361)--Same comments as No. 6.
8. Olokele Sugar Company (Permit No. HI0000116)--Same comments as No. 6.
9. Dole Pineapple Company (Permit No.-None)--Same comments as No. 6.